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Counsel for Chapter 11 Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

In re:

AGTJ13, LLC, a Delaware limited liability
company,

Debtor and Debtor in Possession.

In re:

AGTJ Manager, LLC, a California limited liability
company,

Debtor and Debtor in Possession.

☐ Affects both Debtors

☒ Affects AGTJ13, LLC only

☐ Affects AGTJ13 Manager, LLC only

Lead Case No.: 2:24-bk-11409-SK

Jointly administered with:
2:24-bk-11412-SK

Chapter 11 Cases

**STATUS REPORT REGARDING SALE
MOTION**

Date: February 26, 2025

Time: 9:00 a.m.

Place: Courtroom 1575
255 E. Temple Street
Los Angeles, CA 90012

AGTJ13, LLC (the "Debtor") hereby files this Status Report in connection with the Sale Motion (Doc 279). On December 18, 2024, the Court held a hearing on the Sale Motion, which hearing was treated as a status conference on the Sale Motion. At that hearing, the Sale Motion was continued to February 26, 2025, and the Debtor was ordered to file with the Court on January 29, 2025, a status report discussing whether the Debtor anticipated a hearing on the Sale Motion to go forward on February 26, 2025. At this

1 time, the Debtor is evaluating all of its options with respect to the Sale Motion, but at this time does not
2 anticipate that it will request entry of an order approving the Sale Motion on February 26, 2025. To the
3 extent the Debtor intends to proceed with a substantive hearing on the Sale Motion, the Debtor will file
4 another status report with the Court updating the status of the Sale Motion. The Debtor reserves all rights.

5
6 Dated: January 29, 2025

LEVENE, NEALE, BENDER, YOO
& GOLUBCHIK L.L.P.

7 By: /s/ Krikor J. Meshefejian

8 Ron Bender
9 Beth Ann R. Young
10 Krikor J. Meshefejian
11 Attorneys for Chapter 11 Debtors in
12 Possession
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
2818 La Cienega Avenue, Los Angeles, CA 90034

A true and correct copy of the foregoing document entitled **STATUS REPORT REGARDING SALE MOTION** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **January 29, 2025** I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Simon Aron saron@wrslawyers.com, moster@wrslawyers.com;jlee@wrslawyers.com
- Ron Bender rb@lnbyg.com
- Kevin M Capuzzi kcapuzzi@beneschlaw.com, docket2@beneschlaw.com;lmolinaro@beneschlaw.com
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- Beth Ann R. Young bry@lnbyg.com, bry@lnbyb.com

2. SERVED BY UNITED STATES MAIL: On **January 29, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ *Service information continued on attached page*

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **January 29, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ *Service **BY EMAIL** information continued on attached page*

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 29, 2025

Lourdes Cruz

/s/ Lourdes Cruz

Date

Printed Name

Signature

MML

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